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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
17 LLC,

18 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF JEFF NARDINELLI
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S OPPOSITION TO DEFENDANT
UBER'S MOTION IN LIMINE 23**

1 I, Jeffrey W. Nardinelli, hereby declare as follows.

2 1. I am a member of the bar of the State of California and an associate with Quinn
3 Emanuel Urquhart & Sullivan, LLP, counsel for Plaintiff Waymo LLC ("Waymo"). I make this
4 declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and
5 would testify competently as follows.

6 2. Attached as Exhibit A is a true and correct copy of transcript excerpts from the
7 Videotaped Deposition of Cameron Poetzscher, taken on June 19, 2017 and filed under seal.

8 3. Attached as Exhibit B is a true and correct copy of email exchanges between
9 counsel for the parties between from May 20, 2017 through May 24, 2017 regarding discovery
10 issues.

11 4. Attached as Exhibit C is a true and correct copy of UBER00006471-
12 UBER00006480.

13 5. Attached as Exhibit D is a true and correct copy of UBER00017083-
14 UBER00017091.

15 6. Attached as Exhibit E is a true and correct copy of a June 25, 2017 email from
16 Waymo's counsel to Uber's counsel.

17 7. Attached as Exhibit F is a true and correct copy of transcript excerpts from the
18 FRCP 30(b)(6) deposition of Eric Meyhofer, taken August 18, 2017 and filed under seal.

19 8. Attached as Exhibit G is a true and correct copy of transcript excerpts from the
20 deposition of Jeff Holden, taken August 15, 2017 and filed under seal.

21 9. Attached as Exhibit H is a true and correct copy of transcript excerpts from the
22 deposition of Daniel Gruver, taken August 4, 2017 and filed under seal.

23 I declare under penalty of perjury under the laws of the State of California that the
24 foregoing is true and correct.

25 DATED: September 13, 2017

26 /s Jeff Nardinelli
Jeff Nardinelli

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Jeff Nardinelli.

/s/ Charles K. Verhoeven
Charles K. Verhoeven